

Subject: RE: Shoshana Hebshi v. United States, et al.

From: "Alan Havis" <ahavis@airportdefender.com>

Date: 10/18/2013 3:53 PM

To: "'Tremont, Sarah'" <STremont@cov.com>, "'Calland, Shelli'" <scalland@cov.com>

CC: "'T. Joseph Seward'" <tjseward@cnda-law.com>, "'Lindsey Kaczmarek'" <lkaczmarek@cnda-law.com>

Sarah and Shelli,

As discussed, the general counsel has agreed to appear as designee for the CEO at the next settlement conference scheduled for Thursday, October 31, 2013 before Judge Michelson.

Regarding your query as to whether the WCAA Board must approve any settlement reached in this matter, please note that the Board by ordinance is required to approve any settlement which requires the Airport Authority to pay more than \$50,000.

I hope this satisfies your concerns and that you will not be filing a motion on the subject. Please advise.

Regards,

Alan B. Havis, Esq.

From: Tremont, Sarah [mailto:STremont@cov.com]

Sent: Thursday, October 17, 2013 4:40 PM

To: Alan Havis (ahavis@airportdefender.com); T. Joseph Seward; Lindsey Kaczmarek

Cc: Calland, Shelli

Subject: Shoshana Hebshi v. United States, et al.

Dear Counsel,

We just left a voicemail for Mr. Havis. As we mentioned there, we plan to file a motion to compel the attendance of the WCAA CEO at the October 31 settlement conference because, per Mr. Havis's email of October 10, the CEO is apparently the individual at the WCAA with final authority to settle Ms. Hebshi's claims.

We are contacting you to fulfill our obligation under E.D. Mich. LR 7.1(a) that we seek your concurrence in the motion prior to filing it. Although we said in our voicemail that we would be filing at 6:00 p.m. today, we've decided not to file the motion tonight. Please let us know by 11:00 a.m. tomorrow morning whether you concur in the motion. If we do not hear from you before 11:00 a.m., we will assume that the WCAA Defendants do not concur.

Regards,

Sarah

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